Robert J. Tolchin

From: Robert Tolchin <rjt.berkman@gmail.com>
Sent: Monday, September 10, 2012 1:33 PM

To: Hill, Brian

Cc: Rochon, Mark; Hibey, Richard; dschoen593; hallermm@gmail.com

Subject:SokolowAttachments:Banat.pdf

Counselors -

The PA-generated list of "Palestinian Martyrs" mentioned in the attached 2008 letter is responsive to several of the *Sokolow* plaintiffs' requests for production, because, *inter alia*, that list references Wafa Idris, Ali Jaraa and Mohammed Hashaika. Defendants and their counsel have not produced that 2008 list and are therefore in clear breach of their discovery obligations and of Rule 26(g). Without derogating from plaintiffs' right to seek any appropriate remedies for this blatant misconduct, we request that you inform us by close of business today whether you will produce a copy of the list without judicial compulsion by September 13, 2012.

- Bob Tolchin